

EXHIBIT 2

1 IN THE UNITED STATES DISTRICT COURT

2 MIDDLE DISTRICT OF TENNESSEE

3 NASHVILLE DIVISION

4 -----
5 RACHAEL ANNE ELROD, ANDREW
6 KAUFMAN, and SARAH MARTIN,
7 on behalf of themselves and
8 all others similarly situated,

9 Plaintiffs,

10 v. Case No. 3:20-cv-00617

11 NO TAX 4 NASH, MICHELLE
12 FOREMAN, and JOHN DOES 1-10,

13 Defendants.
14 -----

15 BROOKS BRASFIELD, on behalf
16 of himself and all others
17 similarly situated,

18 Plaintiff,

19 v. Case No. 3:20-cv-00618

20 NO TAX 4 NASH, MICHELLE
21 FOREMAN, and JOHN DOES 1-10,

22 Defendants.
23 -----
24
25

Transcript of Heather Sellers
Conducted on January 25, 2021

2

1 The Remote Deposition of
2 HEATHER SELLERS, taken pursuant to Notice of
3 Taking Deposition, taken before
4 Alexis A. Jensen, RPR, CRR, and a Notary
5 Public in and for the County of Dakota,
6 State of Minnesota, taken on January 25,
7 2021, commencing at approximately 9:33 a.m.

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

1	for a company, lobbying, and serving as a	10:01:16
2	company's spokesman.	10:01:20
3	Is that accurate?	10:01:24
4	A. That is.	10:01:25
5	Q. Okay. And you refer in the bio, the last	10:01:26
6	line, to Best Sellers as a political	10:01:27
7	consulting company.	10:01:30
8	Is that accurate?	10:01:32
9	A. We do that.	10:01:33
10	Q. And what does that mean, "political	10:01:34
11	consulting company"?	10:01:37
12	A. Typically, we will help a candidate if they	10:01:38
13	are wanting to run for office. And we will	
14	sit down, and we will help them with	
15	everything from planning their logo to	10:01:48
16	planning their -- their platform to planning	10:01:51
17	their campaign, and researching who they're	10:01:53
18	running for, et cetera.	10:01:57
19	So, that's what we do primarily is	10:01:58
20	help a candidate learn how -- how to run.	10:02:01
21	And once we put them into that -- the field	10:02:05
22	of yes, they are going to run, then we help	10:02:08
23	them plan their campaign.	10:02:12
24	Q. The biography then lists that you graduated	10:02:18
25	from the University of Mississippi, correct?	10:02:21

1	freelance work for us. And then she went	
2	and worked for Nick Freitas in Virginia.	10:03:17
3	And she is -- for me. And she just every	10:03:23
4	now and then will do a little bit of design	10:03:27
5	work for me, but she never was a full-time	10:03:30
6	calendar-paid employee. But she is someone	10:03:34
7	that I have used for graphic design and all,	10:03:38
8	which I didn't go to school for.	10:03:40
9	Q. Okay.	10:03:45
10	A. Does it say that? I hadn't even -- yeah, it	10:03:45
11	should. It should tell -- she's good at	10:03:48
12	that, painting, colors, et cetera.	10:03:51
13	Q. Did Ms. Carlson work at all with any	10:03:53
14	services provided to No Tax 4 Nash by	10:03:58
15	Best Sellers?	10:04:01
16	A. To the best of my knowledge, no.	10:04:01
17	Q. Okay.	10:04:08
18	A. No. 99 percent sure, no.	10:04:08
19	Q. I'm now going to flip over to what I have as	10:04:13
20	the services tab on the Best Sellers	10:04:16
21	website.	10:04:21
22	Do you see that?	10:04:23
23	A. I do.	10:04:24
24	Q. Okay. And looking at -- at these various	10:04:25
25	services, general consulting, media	10:04:27

1 training, positive PR, advertising and paid 10:04:32
2 media, polling, digital and social media, 10:04:35
3 website development, and production and 10:04:39
4 photography. 10:04:45

5 Are those all services that 10:04:46
6 Best Sellers provides its clients? 10:04:47

7 A. We do, or we will help you -- like, I don't 10:04:47
8 do production and photography.

9 So I'll make it clear when I go
10 over this with a client, I'm not going to 10:04:51
11 show up with a camera or a video camera, but 10:04:54
12 I can certainly help make sure we get the 10:04:58
13 right angles, we get a good production. 10:05:02

14 As far as the other things, like 10:05:07
15 graphic -- the graphic design, website 10:05:08
16 development, we would use someone, but I 10:05:13
17 will definitely oversee that and help. 10:05:13

18 So again, when a candidate comes to 10:05:14
19 me in the beginning of thinking of running 10:05:17
20 for election, I'll go over the services and 10:05:20
21 the things that I have the experience and 10:05:24
22 knowledge of doing, but I may have someone 10:05:25
23 else come in to help me in the meantime to 10:05:29
24 actually film it, so to speak, is a good 10:05:34
25 example. 10:05:38

1	Q. Other than political candidates, what other	10:05:38
2	types of clients does Best Sellers have?	10:05:44
3	A. So I have worked with in the past car	10:05:44
4	dealers. I have worked with furniture	10:05:46
5	stores, restaurants. If you have a service	10:05:55
6	or good that you're trying to get people to	
7	come into, I will help you with that.	
8	Primarily my background is	10:05:58
9	television, but I have bought radio, TV,	10:06:02
10	newspaper.	10:06:05
11	Q. Looking at the services tab, under	10:06:09
12	advertising and paid media, it states under	10:06:11
13	that advertising and paid media description,	10:06:17
14	Building the best media plan based on the	10:06:17
15	budget and winning strategy. TV, radio,	10:06:20
16	direct mail, digital targeting, texting,	10:06:23
17	peer-to-peer texting, robocalls, and	10:06:26
18	ringless voicemails.	10:06:29
19	Did I read that correctly?	10:06:31
20	A. Notice the ones that I have at the end, but	10:06:32
21	yes.	10:06:36
22	Q. Okay. So it mentions robocalls.	10:06:37
23	And what does -- what does that	10:06:40
24	mean in the context of the services that	10:06:43
25	Best Sellers provides?	10:06:46